

Oct 9, 2008

Corbin T. Jones  
Senior Campaign Finance Analyst  
Report Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Identification Number: C00003418

Reference: August Monthly Report (7/01/08 7/31/08)

Dear Mr. Jones:

This correspondence is in response to your Request for Additional Information (RFAI) for the above referenced report.

Our ongoing research matches contributions whose name and address information has inconsistent or varied information with the actual givers. Giver records are corrected by this research. When this information identifies inappropriate contributions, refunds are processed in a timely manner. Each of the specific contributors mentioned in your letter have been addressed in this manner. We have mailed a photocopy of each of the refund checks to the FEC for each item where the refund was required.

Regarding Schedule B supporting Line 21, the voided checks have been amended to more clearly identify the original disbursements. The amounts displayed on the credits have been separated into the same individual amounts reported on the corresponding disbursements. Memos have been updated to indicate the date and nature of the disbursement and credit.

We have amended our reports to more clearly identify the original contributions related to the specific refunds identified in your letter. A reference to the monthly report and date of the contribution is included in the memo text of the refund. In some cases the amendments to the specific contributions occurred in the previously filed reports.

We have amended our report to disclose the aggregate calendar year to date amount on Schedule E.

Regarding the manner of relating Schedule E supporting a 48 hour notice and our monthly report, we had resolved this issue previously. The 48 hour notices were filed at the appropriate time and our monthly report does correlate with the 48 hour notices that were filed. During a meeting between FEC reports analysis department and our committee, it was discussed that at the time of disseminating the communication which precipitates a 24/48 hour notice, the operator does not necessarily know the date that the bill for the expenses is paid. Additionally, the accountant responsible for the payment of bills will not necessarily know the date of the public dissemination. Consequently, it was determined that the schedule E supporting the 24/48 hour notice would display the date of public dissemination, and the Schedule E supporting line 24 of our monthly filing would display the date of the payment. Additionally, during the process of preparing the monthly report, a reference to the 24/48 hour filing would be added to the memo text of the schedule E to correlate with the 24/48 hour notice. This procedure was followed in filing this report.

We have amended the report to include the refunds of contributions from individuals on Schedule B supporting Line 28(a).

The report has been amended. I trust this response answers your inquiry. If you need further clarification please do

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**ETEXT ATTACHMENT**

not hesitate to contact me.

Sincerely,

Pat Huyck  
Director of Accounting